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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 200554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter Of

Telephone Number Portability

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CC Docket No. 95-116

RM 8538

041-8538

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COMMENTS OF ITCs, INC. IN RESPONSE TO THE COMMISSIONS  
FURTHER NOTICE OF PROPOSED RULEMAKING IN THE MATTER OF  
TELEPHONE NUMBER PORTABILITY

August 16, 1996

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## **EXECUTIVE SUMMARY**

ITCs, an economic cost consultant to rural independent telephone companies, comments herein to the Further Notice of Proposed Rulemaking concerning number portability, CC Docket 95-116, RM 8538.

First, it is the opinion of ITCs that the recovery of costs should be the responsibility of those who benefit from the implementation of a public policy and that they should bear the burden of the directly related costs. Any other approach will not induce the proper incentives; rather it would burden the non-participating carriers or customers and give rise to manipulation of the process. Further, costs should be borne by not only present, but future beneficiaries as well.

Costs common to all beneficiaries should be shared among them on the basis of gross revenues net of amounts paid to others (such as access charges). Non-recurring costs should be recovered through a single assessment to present and future carriers (through credits to those who have previously contributed), operational costs should be allocated by an independent administrator to all parties utilizing common facilities, and query, upload and download costs should be assessed based on usage.

Direct costs should be borne by each incurring carrier; indirect costs should not be recovered as part of the number portability implementation or operational costs. Finally, price cap carriers should be allowed to treat shared and direct costs as exogenous costs.

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the matter Of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	RM 8535
	)	

**COMMENTS OF ITCs, INC. IN RESPONSE TO THE COMMISSIONS  
FURTHER NOTICE OF PROPOSED RULEMAKING IN THE MATTER OF  
TELEPHONE NUMBER PORTABILITY**

ITCs, Inc., an economic cost consultant to independent telephone companies serving America's rural areas, including Chariton Valley Telephone Company, Columbine Telephone Company, Columbus Telephone Company, Cunningham Telephone Company, ETEX Telephone Cooperative, Moka Dial, Inc. - Kansas, Moka Dial, Inc. - Missouri, South Central Telecommunications of Kiowa, South Central Telephone Association - Kansas, South Central Telephone Association - Oklahoma, Steelville Telephone Exchange, Inc. Tri-Country Telephone Association, Inc., TCT West, Inc. and Wiggins Telephone Association, by counsel, respectfully respond to the Further Notice of Proposed Rulemaking in the above captioned matter as follows:

**I. INTRODUCTION**

1. In general terms, it is the position of ITCs that in all matters of cost and cost recovery, those who benefit, directly or indirectly, from the implementation of public policy should bear the burden of such costs. Further, it appears to ITCs that cost attribution in a fully competitive environment should be directed toward the beneficiaries of a service or product and such should be

the case in the telecommunications industry.

2. To extend the responsibility for cost recovery to parties other than the beneficiaries reflects an economic structure that is less than market driven, can only burden existing carriers and will only hasten the rewrite of the 1996 Act. Further, it will give rise to manipulation as will any mechanism that does not truly reflect the driving forces of a free enterprise system. Finally, the adage that all communications providers will benefit, if only through enhanced technology is not necessarily true and may only serve as the basis for litigation.

3. Any cost sharing mechanism should be such that future new entrants participate in the cost recovery process through a form of credit to those who have previously contributed to the cost recovery process. A concept of this nature will ensure competitive neutrality.

4. Finally, the accounting for these costs should be such that they are subject to Universal Service Fund support in those instances where number portability is provided in high cost areas.

## **II. COSTS OF FACILITIES SHARED BY ALL CARRIERS FOR THE PROVISION OF NUMBER PORTABILITY**

5. Costs common to all beneficiaries of number portability should be shared by all participants on the same basis on which the costs were incurred. If regional structures are involved, then the costs should be allocated on a regional basis within the framework reflected in paragraphs 1-3 above. To this end, regional operations are in the best interest of the participants because the need for portability may well vary from region to region. Further, there is no reason

to think a regional independent administrator could not allocate the aggregated costs in an equitable manner.

6. Gross revenues less charges paid to other carriers is a reasonable approach; however the carriers to which an allocation is directed should only be a carrier benefiting from portability.

7. Non-recurring costs should be recovered from all present and future beneficiaries on the basis of a single assessment with credits provided by future carriers as indicated in paragraph 3 above. Operational costs should be allocated by the administrator among all parties utilizing the facility on behalf of the provider. Finally, query, upload and download costs should be assessed on a usage basis but only by those who benefit from the process. In other words, if the IXC's do not benefit from the policy of number portability, they should not be assessed a share of the costs.

8. ITC's submits that the FCC has authority with respect to the designation of administrative entities and may impose relevant obligations and rules deemed necessary to effectively implement the process.

#### **DIRECT CARRIER - SPECIFIC COSTS TO IMPLEMENT NUMBER PORTABILITY**

9. The direct costs incurred by each carrier should be borne by the carrier incurring those costs and should be recovered as part of the costs of interconnection between carriers. If it is determined the consumer should bear a portion of the cost burden, then such should be charged directly to those customers opting for portability as a separately identified charge or as

part of a non-recurring change charge. In any event, customers not involved in portability should not be assessed charges they do not directly incur. Finally, any charges levied directly on consumers should be reflective of the local market economics and related costs as opposed to any broader based charge such as a nationwide average.

#### **INDIRECT CARRIER - SPECIFIC COSTS TO IMPLEMENT NUMBER PORTABILITY**

10. The indirect costs referenced in the FNPRM should not be recovered as part of portability costs. In fact, to do so only opens the door to further questions and manipulation.

#### **PRICE CAP TREATMENT**

11. Carrier specific costs incurred for purposes of number portability implementation should be treated as exogenous costs. This should include common or joint costs incurred on a shared basis. Costs not directly incurred for purposes of number portability should not be included as part of costs related to the ability to provide this service.

Respectfully submitted,  
ITC

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**CERTIFICATE OF SERVICE**

I, Tracy L. Trynock, do hereby certify that a copy of the foregoing Further Notice of Proposed Rulemaking in the Matter of Telephone Number Portability has been served on the parties listed on the attached list, via first class mail, postage prepaid, on this 16th day of August 1996.

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